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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA  
IN SUPPORT OF JOINT SUBMISSION  
RE: SEALING PORTIONS OF THE JUNE  
2, 2021 HEARING TRANSCRIPT**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the parties’  
7 Joint Submission re: Sealing Portions of the June 2, 2021 Hearing Transcript (“Transcript”). In  
8 making this request, Google has carefully considered the relevant legal standard and policy  
9 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief  
10 that the information sought to be sealed consists of Google’s confidential and proprietary information  
11 and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Transcript,  
13 attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential technical  
15 information regarding the various types of Google’s internal identifiers/cookies and their proprietary  
16 functions, that Google maintains as confidential in the ordinary course of its business and is not  
17 generally known to the public or Google’s competitors.

18 5. Such confidential information reveals Google’s internal strategy and system design  
19 regarding various important products, and falls within the protected scope of the Protective Order  
20 entered in this action. *See* Dkt. 61 at 2.

21 6. Public disclosure of such confidential information could affect Google’s competitive  
22 standing as competitors may alter their identifier system designs and practices relating to competing  
23 products. It may also place Google at an increased risk of cyber security threats, as third parties may  
24 seek to use the information to compromise Google’s identifier systems.

25 7. For these reasons, Google respectfully requests that the Court order the identified  
26 portions of the Transcript to be sealed.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true and  
2 correct. Executed in Los Angeles, California on June 16, 2021.

3  
4 DATED: June 16, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

5  
6  
7 By 

Viola Trebicka

*Attorney for Defendant*